

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
TRACY REIN,

Plaintiff,

-against-

CAB EAST LLC., FORD MOTOR CREDIT COMPANY,  
LLC., and BRIAN K. DAHMS,

Defendants.  
-----X

ECF CASE: 08-CV-02899

**REQUEST FOR ADMISSIONS**

**S I R S :**

**PLEASE TAKE NOTICE**, that plaintiff hereby demands that pursuant to the provisions of FRCP Rule 36, the defendant, CAB EAST, LLC, admit or deny the following:

1. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, was and still is a foreign limited liability company duly organized and existing under and by virtue of the laws of a State other than the State of New York.

2. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, was and still is a limited liability company duly organized and existing under and by virtue of the laws of the State of Delaware.

3. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, owned a certain motor vehicle bearing license plate number WAT39P the State of New Jersey.

4. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, was the registered owner of a certain motor vehicle bearing license plate number WAT39P for the State of New Jersey.

5. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, was the title owner of a certain motor vehicle bearing license plate number WAT39P for the State of New Jersey.

6. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, was and still is a foreign limited liability company duly organized and existing under and by virtue of the laws of a State other than the State of New York.

7. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, was and still is a limited liability company duly organized and existing under and by virtue of the laws of the State of Delaware.

8. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, owned a certain motor vehicle bearing license plate number WAT39P for the State of New Jersey.

9. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, was the registered owner of a certain motor vehicle bearing license plate number WAT39P for the State of New Jersey.

10. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, was the title owner of a certain motor vehicle, bearing license plate number WAT39P for the State of New Jersey.

11. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, was employed by defendant, CAB EAST LLC.

12. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, operated the motor vehicle bearing license plate number WAT39P for the State of New Jersey, within the scope of his employment with defendant CAB EAST LLC.

13. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, operated the motor vehicle bearing license plate number WAT39P for the State of New Jersey, with the permission and consent of the owner, CAB EAST LLC, express or implied.

14. That on or before the 19th day of December, 2007, the defendant, BRIAN DAHMS, leased a vehicle bearing license plate number WAT39P for the State of New Jersey.

15. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, leased the vehicle, bearing license plate number WAT39P for the State of New Jersey, from CAB EAST LLC.

16. That on or before the 19th day of December, 2007, the defendant, BRIAN DAHMS, rented a vehicle, bearing license plate number WAT39P for the State of New Jersey.

17. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, rented the vehicle, bearing license plate number WAT39P for the State of New Jersey, from CAB EAST LLC.

18. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, was employed by defendant, FORD MOTOR CREDIT COMPANY LLC.

19. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, operated the motor vehicle bearing license plate number WAT39P for the State of New Jersey, within the scope of his employment with defendant FORD MOTOR CREDIT COMPANY LLC.

20. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, operated the motor vehicle bearing license plate number WAT39P for the State of New Jersey, with the permission and consent of the owner, FORD MOTOR CREDIT COMPANY LLC, express or implied.

21. That on or before the 19th day of December, 2007, the defendant BRIAN DAHMS, leased a vehicle bearing license plate number WAT39P for the State of New Jersey, from FORD MOTOR CREDIT COMPANY LLC.

22. That on or before the 19th day of December, 2007, the defendant BRIAN DAHMS, rented the vehicle bearing license plate number WAT39P for the State of New Jersey from FORD MOTOR CREDIT COMPANY LLC.

23. That on or before the 19th day of December, 2007, the defendant BRIAN DAHMS, owned a motor vehicle bearing license plate number WAT39P for the State of New Jersey.

24. That on or before the 19th day of December, 2007, the defendant BRIAN DAHMS, was a registered owner of a motor vehicle bearing license plate number WAT39P for the State of New Jersey.

25. That on or before the 19th day of December, 2007, the defendant BRIAN DAHMS, was the title owner of a motor vehicle bearing license plate number WAT39P for the State of New Jersey

26. That on the 19th day of December, 2007 the vehicle operated by the defendant, BRIAN DAHMS, came into contact with the plaintiff, TRACY REIN.

Dated: New York, NY  
April 14, 2008

Yours, etc.,

A handwritten signature in black ink, appearing to read 'E. Armstrong', written over a horizontal line.

**EDWARD W. ARMSTRONG (EA9374)**  
**EDWARD W. ARMSTRONG, P.C.,**  
Attorney for Plaintiff  
233 Broadway, Suite 707  
New York, New York 10279  
Tel. No.: (212) 964-3544

TO: John M. Downing, Jr.  
DOWNING & PECK, P.C.  
Attorney for Defendants  
5 Hanover Square, 20<sup>th</sup> Floor  
New York, New York 10007  
Tel. No.: (212) 514-9190  
File No.: 3.1167

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
TRACY REIN,

Plaintiff,

-against-

CAB EAST LLC., FORD MOTOR CREDIT COMPANY,  
LLC., and BRIAN K. DAHMS,

Defendants.  
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ECF CASE: 08-CV-02899

**REQUEST FOR ADMISSIONS**

**S I R S :**

**PLEASE TAKE NOTICE**, that plaintiff hereby demands that pursuant to the provisions of FRCP Rule 36, the defendant, FORD MOTOR CREDIT COMPANY LLC, admit or deny the following:

1. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, was and still is a foreign limited liability company duly organized and existing under and by virtue of the laws of a State other than the State of New York.
2. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, was and still is a limited liability company duly organized and existing under and by virtue of the laws of the State of Delaware.
3. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, owned a certain motor vehicle bearing license plate number WAT39P the State of New Jersey.
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5. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, was the title owner of a certain motor vehicle bearing license plate number WAT39P for the State of New Jersey.

6. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, was and still is a foreign limited liability company duly organized and existing under and by virtue of the laws of a State other than the State of New York.

7. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, was and still is a limited liability company duly organized and existing under and by virtue of the laws of the State of Delaware.

8. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, owned a certain motor vehicle bearing license plate number WAT39P for the State of New Jersey.

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12. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, operated the motor vehicle bearing license plate number WAT39P for the State of New Jersey, within the scope of his employment with defendant CAB EAST LLC.

13. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, operated the motor vehicle bearing license plate number WAT39P for the State of New Jersey, with the permission and consent of the owner, CAB EAST LLC, express or implied.

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20. That on the 19th day of December, 2007, the defendant, BRIAN DAHMS, operated the motor vehicle bearing license plate number WAT39P for the State of New Jersey, with the permission and consent of the owner, FORD MOTOR CREDIT COMPANY LLC, express or implied.

21. That on or before the 19th day of December, 2007, the defendant BRIAN DAHMS, leased a vehicle bearing license plate number WAT39P for the State of New Jersey, from FORD MOTOR CREDIT COMPANY LLC.

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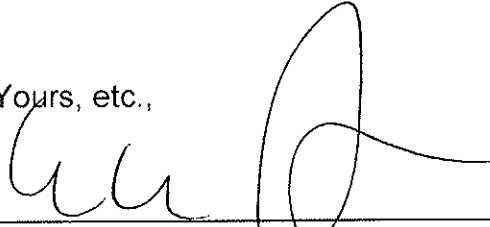
24. That on or before the 19th day of December, 2007, the defendant BRIAN DAHMS, was a registered owner of a motor vehicle bearing license plate number WAT39P for the State of New Jersey.

25. That on or before the 19th day of December, 2007, the defendant BRIAN DAHMS, was the title owner of a motor vehicle bearing license plate number WAT39P for the State of New Jersey

26. That on the 19th day of December, 2007 the vehicle operated by the defendant, BRIAN DAHMS, came into contact with the plaintiff, TRACY REIN.

Dated: New York, NY  
April 15, 2008

Yours, etc.,

A handwritten signature in black ink, appearing to read 'Edward W. Armstrong', written over a horizontal line.

**EDWARD W. ARMSTRONG (EA9374)**  
**EDWARD W. ARMSTRONG, P.C.,**  
Attorney for Plaintiff  
233 Broadway, Suite 707  
New York, New York 10279  
Tel. No.: (212) 964-3544

TO: John M. Downing, Jr.  
DOWNING & PECK, P.C.  
Attorney for Defendants  
5 Hanover Square, 20<sup>th</sup> Floor  
New York, New York 10007  
Tel. No.: (212) 514-9190  
File No.: 3.1167

UNITED STATES DISTRICT COURT  
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5. That on the 19th day of December, 2007, the defendant, CAB EAST LLC, was the title owner of a certain motor vehicle bearing license plate number WAT39P for the State of New Jersey.

6. That on the 19th day of December, 2007, the defendant, FORD MOTOR CREDIT COMPANY LLC, was and still is a foreign limited liability company duly organized and existing under and by virtue of the laws of a State other than the State of New York.

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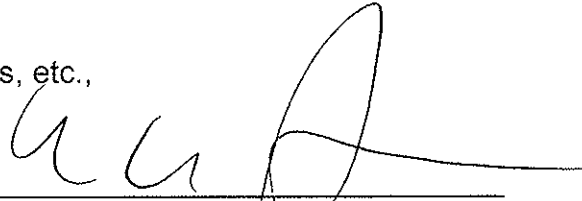
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26. That on the 19th day of December, 2007 the vehicle operated by the defendant, BRIAN DAHMS, came into contact with the plaintiff, TRACY REIN.

Dated: New York, NY  
April 16, 2008

Yours, etc.,

A handwritten signature in black ink, appearing to be 'EWA', written over a horizontal line.

**EDWARD W. ARMSTRONG (EA9374)**  
**EDWARD W. ARMSTRONG, P.C.,**  
Attorney for Plaintiff  
233 Broadway, Suite 707  
New York, New York 10279  
Tel. No.: (212) 964-3544

TO: John M. Downing, Jr.  
DOWNING & PECK, P.C.  
Attorney for Defendants  
5 Hanover Square, 20<sup>th</sup> Floor  
New York, New York 10007  
Tel. No.: (212) 514-9190  
File No.: 3.1167